

JODI LINKER
Federal Public Defender
Northern District of California
ELISSE LAROUCHE
Assistant Federal Public Defender
13th Floor Federal Building - Suite 1350N
1301 Clay Street
Oakland, CA 94612
Telephone: (510) 637-3500
Facsimile: (510) 637-3507
Email: Elisse_Larouche@fd.org

Counsel for Defendant Grant

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARRIE GRANT,

Defendant.

Case No.: CR 24-403 AMO

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE HEARING**

Hearing Date: September 16, 2024

Hearing Time: 2:00 p.m.

The parties in the United States v. Grant matter are presently set for a status hearing on Monday, September 16, 2024. The parties STIPULATE and agree that this matter should be CONTINUED until November 18, 2024, or another available date in approximately 60 days, and that excluding time until that date will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from September 16, 2024 through November 18, 2024 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The reason for this request is that the government has produced some discovery, but is still

1 producing discovery. The defense and the government are working together on ongoing discovery
2 production. The defense needs time to review discovery and discuss it with her client. Ms. Grant is
3 not in custody.

4
5 IT IS SO STIPULATED.

6
7 Dated: September 11, 2024

8 JODI LINKER
9 Federal Public Defender
Northern District of California

10 /S
11 ELISSE LAROCHE
Assistant Federal Public Defender

12
13 Dated: September 11, 2024

14 ISMAIL J. RAMSEY
15 United States Attorney
Northern District of California

16 /S
17 ANDREW PAULSON
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARRIE GRANT,

Defendant.

Case No.: CR 24-403 AMO

~~[PROPOSED]~~ ORDER TO CONTINUE
HEARING

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court finds that failing to exclude the time from September 16, 2024 through November 4, 2024 ~~November 18, 2024~~ would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from September 16, 2024 through November 4, 2024 ~~November 18, 2024~~ from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, it is hereby

November 4, 2024
ORDERED that the time from September 16, 2024 through November 4, 2024 ~~November 18, 2024~~ shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv). Further, it is

November 4, 2024
ORDERED that this matter be continued to November 4, 2024 ~~November 18, 2024~~ for STATUS HEARING.



1
2
3
4 IT IS SO ORDERED.
5

6 Dated: _____

7 ARACELI MARTÍNEZ-OLGUÍN
8 United States District Judge
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28